



PHARMAVITE

September 18, 1998

1543 '98 OCT -6 P2:58



Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW
Washington, DC 20204

Dear Sir or Madam:

Pursuant to Section 403(r)(6) of the Federal Food, Drug and Cosmetic Act and Section 101.93 of FDA's regulations, we hereby notify you that we are using the following statement(s):

- (1) Name and address of manufacturer:
Pharmavite Corporation, PO Box 9606, Mission Hills, CA 91346
- (2) Text of the statement(s):
Helps Strengthen Immune System

Echinacea may stimulate natural resistance by helping strengthen the immune system. Echinacea is very popular in Europe where it's used to strengthen and enhance overall health and well-being. American Indians used Echinacea - also called Purple Coneflower - during the cold weather season.

Helps Maintain Immune Function

Echinacea may stimulate natural resistance by helping maintain the immune system.
- (3) Name of the dietary ingredient if not provided in the text of the statement:
see above
- (4) Name of the dietary supplement:
products containing Echinacea as a single ingredient or in combination with other ingredients

The above statement(s) may be used in one or more of the following brands of products: Nature Made, Sunny Maid, Nature's Resource, AAFES, AARP, Osco, Sav-On, Valu Wise, Bartell Drug, CVS, Duane Reade, Walgreens, Longs, Spring Valley, Brite Life, Family Pharmacy, GNP, Valu-Rite.

echinacea.wpd

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We certify the information in this notice is complete and accurate, and we have substantiation that the above statement(s) is truthful and not misleading.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Kropp', with a large circular flourish at the beginning and a wavy line extending to the right.

David Kropp
Manager, Regulatory and Legal Affairs